

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

KELLY JAMES CLARK, JR.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:20--cv-00017 (TTC)
)	
KEVIN CARL, <i>et al.</i> ,)	
)	
Defendants.)	

PLAINTIFF KELLY JAMES CLARK, JR.'S
AMENDED FINAL PRETRIAL DISCLOSURES: EXHIBITS

Plaintiff Kelly James Clark, Jr. (“Plaintiff” or “Mr. Clark”), through counsel, submits these amended pretrial disclosures pursuant to Fed. R. Civ. P. 26(a)(3) and this Court’s August 5, 2024 Order (Dkt. 163), as follows:

I. Plaintiff may present the following exhibits at trial:

Ex. A: Officer Miller’s Incident Report dated December 30, 2016 (D_000001-2).

Ex. B: Officer Carl’s Incident Report dated December 30, 2016 (D_000003-4).

Ex. C: Logbook from Central Virginia Regional Jail, with Handwritten Officer Notes (D_000296-314)

Ex. D: UVA Hospital Records from Dec. 30, 2016, titled “Appointment in Radiology.” (D_001843-1851).

Ex. E: UVA Hospital Records from Dec. 30, 2016, titled “Clinical Notes.” (D_002025-26 and D_002072).

Ex. F: UVA Hospital Records from Dec. 30, 2016, titled “Progress Notes.” (D_002115; D_002122-2128).

Ex. G: UVA Hospital Records from Dec. 30, 2016, titled “Labs.”

(D_002241; D_002247; and D_2250-2254).

Ex. H: UVA Hospital Records from Dec. 30, 2016, titled “Imaging.”
(D_002567-2572).

Ex. I: UVA Hospital Records from Dec. 30, 2016, titled “Medication Administration.”
(D_002634-2635; D_002640-2642; D_002646-2657; and D_002661-2669).

Ex. J: UVA Hospital Records from Dec. 30, 2016, titled “Immunizations Given.”
(D_002673).

Ex. K: UVA Hospital Records from Dec. 30, 2016, titled “Other Orders.”
(D_002681-2683; D_002688-2691).

Ex. L: UVA Hospital Records from Dec. 30, 2016, titled “Flowsheets (group 1)”
(D_002734-2738; D_002743; D_002756-57; D_002762-2765; D_002801-2802;
D_002817-002825);

Ex. M: UVA Hospital Records from Dec. 30, 2016, titled “Flowsheets (group 2)”
(D_002838; D_002850; D_002855-2864; D_002874-2877; D_002882-2884; D_002892-
2894).

Ex. N: UVA Hospital Records from Dec. 30, 2016, titled, “Care Plan.”
(D_002895-2902).

Ex. O: UVA Hospital Records from Dec. 30, 2016, titled “Patient Education.”
(D_002906-2907).

Ex. P: UVA Hospital Records: Room Transfers (D_001917).

Ex. Q: UVA Hospital Records Re: Shackles (D_2100-2101).

Ex. R: UVA Hospital Records: Physical Therapy Received on Dec. 30, 2016 (D_002116-2119).

Ex. S: UVA Medical Records – Discharge Summaries (Dkt. 89-9; Dkt. 132-6).

II. If the need arises, Plaintiff may offer the following exhibits:

Ex. T: Defendants’ Responses to Plaintiff’s First Set of Requests for Production

Ex. U: Defendants’ Responses to Plaintiff’s Second Set of Requests for Production

Ex. V: Affidavit of Ofc. Carl dated January 5, 2021

Ex. W: Affidavit of Ofc. Miller dated January 8, 2021

Ex. X: Defendants' Answer to Plaintiff's Third Amended Complaint

Ex. Y: Plaintiff's Third Amended Complaint

Ex. Z: Defendants' Fifth Supplemental Initial Disclosures

Plaintiff reserves the right to introduce any exhibit(s) identified by Defendants in their pretrial disclosures (including any amended disclosures), not objected to by Plaintiff, as well as any documents needed for impeachment or rebuttal purposes.

Plaintiff reserves the right to amend his exhibit list to add any documents produced by Defendants on or after the date of this filing.

DATED: August 6, 2024

BY: /s/
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CERTIFICATE OF SERVICE

I hereby certify that, on August 6, 2024, I served the foregoing amended exhibit list via CM/ECF upon the following:

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